

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

ROBERT MENENDEZ et al.,

Defendants.

Case No. S2 23-cr-490 (SHS)

UNDER SEAL

REPLY DECLARATION OF AVI WEITZMAN
IN SUPPORT OF SENATOR ROBERT MENENDEZ'S PRETRIAL MOTIONS

I, Avi Weitzman, declare as follows:

1. I am an attorney licensed to practice law before this Court. I am a Partner in the law firm of Paul Hastings LLP, counsel for Defendant Senator Robert Menendez in this matter. I submit this Reply Declaration in Support of Senator Menendez's Pretrial Motions. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of an e-mail chain between myself and AUSA Lara Pomerantz between February 9, 2024 and February 12, 2024.

3. Attached hereto as **Exhibit B** is a true and correct copy of an email and its attachment containing an official invitation to the July 25, 2018 dinner with Egyptian Official-1 sent by the Egyptian Defense Office to a member of Senator Menendez's staff on June 28, 2018. The government obtained these documents from a search warrant of Google account [REDACTED], and produced it to the defense with Bates numbers SDNY_R11_00468397 and SDNY_R11_00468398.

4. Attached hereto as **Exhibit C** is a true and correct copy of an October 29, 2021 transcript in *United States v. Sarshar*, No. 21 Cr. 202 (GHW), during which the Court issued an oral ruling granting defendant's duplicity motion.

5. Attached hereto as **Exhibit D** is a true and correct copy of a February 17, 2017 Declaration filed by defense counsel in *United States v. Shkreli*, No. 15 Cr. 637 (KAM), in support of defendant's Motion for Severance.

6. Attached hereto as **Exhibit E** is a true and correct copy of a February 23, 2017 Joint Motion for Severance filed in *United States v. Blunt*, No. 16 Cr. 50 (SHR).

7. Attached hereto as **Exhibit F** is a true and correct copy of an April 17, 2014 Memorandum Order in *United States v. McDonnell*, No. 14 Cr. 12 (JRS).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this Declaration on February 12, 2024.

By: /s/ Avi Weitzman
Avi Weitzman